

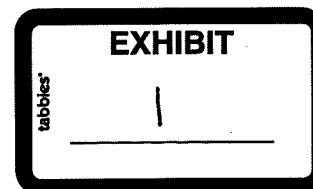
Defendants' Initial Rule 30(b)(6) Areas of Inquiry

Notice 1: (Each Defendant's Runoff or Releases)

1. The dates, locations, and manner in which each Defendant or that Defendant's contract growers have failed to properly manage, store or dispose of their poultry litter / poultry waste.
2. The specific poultry litter / poultry waste management practices of each Defendant or that Defendant's contract growers alleged to have caused runoff or releases of Alleged Pollutants or Contaminants.
3. The location and ownership of every parcel of real property that You allege was harmed or impacted by the actions of each Defendant or that Defendant's contract growers.
4. The areas in which you alleged that bacteria or other alleged pollutants or contaminants have come to be located as a result of runoff or releases from property owned, managed, or controlled by each Defendant or that Defendant's contract growers.
5. The names and contact information of all persons known or alleged by You to have factual information relevant to Topics 1-4 and Your understanding of the substance of such persons' knowledge.
6. To the extent You are unable to identify a designee(s) with regard to Topics 1-4, the reasons You are unable to identify a designee(s).
7. To the extent You are unable to respond to Topics 1-4 with information specific to each Defendant or that Defendant's contract growers (as opposed to information / actions of the poultry industry generally), the reasons You are unable to provide information specific to each Defendant or that Defendant's contract growers.

Notice 2: (Human Health Hazards Attributed to Each Defendants)

1. The human health hazards specifically caused by poultry litter / poultry waste generated by each Defendant or that Defendant's contract growers.
2. Your knowledge regarding the presence of bacteria in the surface and subsurface waters in the IRW extending back to 2000, including the locations, concentrations, species, and trends for any bacteria identified in such waters.
3. Studies or investigations performed by You or others regarding the presence of bacteria in surface or subsurface waters in the IRW extending back to 2000.
4. Actions taken or warnings or health advisories issued by You in connection with any and all health hazards identified in response to Topic No. 1.
5. The specific actions of each Defendant or that Defendant's contract growers alleged to constitute "unreasonable and substantial danger to the public's health and safety".
6. All information comparing the predicted or anticipated bacterial concentrations/loadings in the surface and subsurface waters of the IRW in 2008 to the concentrations/loadings of bacteria in the current and prior years.



7. The names and addresses of all individuals who have sustained or may sustain health conditions specifically caused by poultry litter / poultry waste generated by each Defendant or that Defendant's contract growers.

8. The names and contact information of all persons known or alleged by You to have factual information relevant to Topics 1-7 and Your understanding of the substance of such persons' knowledge.

9. To the extent You are unable to identify a designee(s) with regard to Topics 1-7, the reasons You are unable to identify a designee(s).

10. To the extent You are unable to respond to Topics 1-7 with information specific to each Defendant or that Defendant's contract growers (as opposed to information / actions of the poultry industry generally), the reasons You are unable to provide information specific to each Defendant or that Defendant's contract growers.

Notice 3: (Knowledge of "Pollutants" and Efforts to Control)

1. Your first knowledge or awareness that, specifically, the operations of each Defendant or that Defendant's contract growers might be a potential source of Alleged Pollutants or Contaminants.

2. The constituents or components of poultry litter / poultry waste specifically generated by each Defendant or that Defendant's contract growers alleged to have harmed the environment of the IRW.

3. The constituents or components of poultry litter / poultry waste specifically generated by each Defendant or that Defendant's contract growers alleged to have harmed human health in the IRW.

4. The damage, injury, or harm to the IRW, if any, that is specifically attributable to the improper poultry litter / poultry waste disposal practices of each Defendant or that Defendant's contract growers.

5. The costs, if any, incurred by You to remediate damage, injury, or harm to the IRW specifically attributable to the alleged improper poultry litter / poultry waste disposal practices of each Defendant or that Defendant's contract growers.

6. Sources of phosphorous / phosphorus compounds, nitrogen / nitrogen compounds, arsenic / arsenic compounds, zinc / zinc compounds, copper / copper compounds, hormones, and/or microbial pathogens in the IRW other than poultry industry operations.

7. Your efforts to address, control, minimize or eliminate the effects of other sources of phosphorous / phosphorus compounds, nitrogen / nitrogen compounds, arsenic / arsenic compounds, zinc / zinc compounds, copper / copper compounds, hormones, and/or microbial pathogens in the IRW.

Notice 4: (Violations of Federal and Oklahoma Law)

1. The specific actions of each Defendant or that Defendant's contract growers alleged to have violated the laws, rules, or regulations of the United States or the State of

Oklahoma within the IRW, including the name and address of the Defendant or contract grower committing such a violation, the date and location of the violation, the specific conduct or acts constituting each violation, and the nature and outcome of any investigations or administrative action relating to each violation.

2. The specific actions of each Defendant or that Defendant's contract growers alleged to have resulted in the run off, release, or discharge of an Alleged Pollutant to the air, land, or waters of the State of Oklahoma within the IRW, including the name and address of the Defendant or contract grower committing such a violation, the date and location of the violation, the specific conduct or acts constituting each violation, and the nature and outcome of any investigations or administrative action relating to each violation.

3. The specific actions of each Defendant or that Defendant's contract growers alleged to have resulted in nuisance(s) within the IRW and the nature of the alleged nuisance(s), including the name and address of the Defendant or contract grower involved, the date and location of the nuisance(s), the specific conduct or acts constituting each nuisance(s), and the nature and outcome of any investigations or administrative action relating to each nuisance.

4. The specific actions of each Defendant or that Defendant's contract growers alleged to have resulted in trespass(es) within the IRW and the nature of the alleged trespass(es), including the name and address of the Defendant or contract grower committing such a trespass(es), the date and location of the trespass(es), the specific conduct or acts constituting each trespass(es), and the nature and outcome of any investigations or administrative action relating to each trespass(es).

5. The "substantial circumstantial evidence" that You allege demonstrates violations of statutes or regulations by the Cargill Defendants, including evidence pertaining to grower Ernest Doyle.

Notice 5: (Defendants' Alleged Responsibility for Actions of Growers)

1. The contractual relationship between each Defendant and that Defendant's contract growers.

2. The alleged "domination and control" of each Defendant of that Defendant's contract growers.

3. Each Defendant's alleged responsibility for poultry litter / poultry waste created as a result of that Defendant's contract growers' operations.

4. Each Defendant's responsibility, if any, for poultry litter / poultry waste created as a result of poultry industry operations not owned by that Defendant or that Defendant's contract growers.

Notice 6: (State-Owned or Leased Lands)

1. The location and use of real property owned or leased by the State in the IRW including but not limited to State- or County-owned highways, roads, or rights of way.

2. For properties identified in response to Topic No. 1, the extent to which fertilizers (organic or inorganic), biosolids, sludge, pesticides, and herbicides have been stored, applied, or used on such properties, including the periods of use and the amounts used.

3. For properties identified in response to Topic No. 1, the location, size, capacity, and age of septic systems, wastewater lagoons, wastewater treatment systems, pump stations, or lift stations used to store, dispose, treat, or handle sewage or wastes and any discharges, releases, overflows, leaching, or run off of sewage or wastes from such properties.

4. The location, depth, flow, and quality of any groundwater located beneath properties identified in response to Topic No. 1 and the results of any testing or sampling of such groundwater.

Notice 7: State Use, Sale, Transporting, or Marketing of Poultry Litter

1. The locations of all applications of poultry litter by the State in the IRW including the date and amount of each poultry litter application, the total acreage covered by each application, and the purpose of each application.

2. The transportation of poultry litter by the State into or out of the IRW including the dates of transportation, the origination and destination locations, the amounts transported, the purpose for transporting poultry litter, and any recommendations given or limitations imposed by the State on the use of the transported poultry litter.

3. The nature and amount of any financial assistance provided by the State in connection with the purchase, sale, exchange, or transportation of poultry litter into or out of the IRW, including the total amount of all financial subsidies by the State; the total amount of poultry litter purchased, sold, or transported in connection with such financial subsidies; the proposed use of any transported poultry litter; and any recommendations given or limitations imposed by the State on the use of the transported poultry litter.

4. All efforts by the State to market poultry litter as a fertilizer or to encourage the utilization of poultry litter as a fertilizer, including but not limited to efforts undertaken and materials disseminated in connection with the Oklahoma Poultry Litter Market (www.ok-littermarket.org) and the Oklahoma Poultry Litter Transfer Program, and the representations made by the State regarding the economic value, nutrient content, and agricultural benefits associated with poultry litter.

5. The locations of all applications of poultry litter in the IRW approved, permitted, or authorized by the State pursuant to animal waste management plans (or comparable documents) prepared, developed, or issued (in whole or in part) by the State or by persons working at the direction of or under the authority of the State, and the date and amount of each such application and total acreage covered by each such application.

6. The amounts the State has expended to purchase poultry litter.

Notice 8: Biosolids or Sewage Sludge

1. The locations of all applications of biosolids or sewage sludge in the IRW which have occurred either with the knowledge of the State or pursuant to permits issued or sludge management plans prepared by the State or persons working at the direction of or under the authority of the State, and the date and amount of each such application and total acreage covered by each such application.

2. The annual quantity of biosolids or sewage sludges generated by publicly owned treatment works ("POTWs") operating in the Oklahoma portion of the IRW, the disposition or use of all such materials, and any recommendations given or limitations imposed by the State on the use or disposition of such materials in the IRW.

3. Discussions (both written and oral) between the State and others (including municipalities) about biosolids and sewage sludge, including communications about land application or other use or disposal of biosolids or sewage sludge.

4. The identity of State personnel involved in evaluating issues relating to biosolids or sewage sludge and/or issuing licenses or permits relating to biosolids or sewage sludge.

5. All information about the content or constituents of biosolids or sewage sludge, the effect of biosolids or sewage sludge on the environment, what occurs to the constituents of biosolids or sewage sludge after being placed in the environment, and any potential risks or impacts of biosolids or sewage sludge on human health.

Notice 9: Point Source Discharges

1. The name and location of all POTWs or other point sources which have discharged or released Alleged Pollutants into the waters of the IRW either with the knowledge of the State or pursuant to permits issued or approved by the State.

2. The design capacity and average daily flow or discharge volumes for wastewater from each of the POTWs or point sources identified in response to Topic No. 1.

3. A description of any and all treatment processes or equipment intended or used by each of the POTWs or point sources identified in response to Topic No. 1 to remove, treat, or reduce the discharge or release of Alleged Pollutants into the waters of the IRW.

4. The annual quantity of each of the Alleged Pollutants released or discharged into the waters of the IRW by the POTWs or point sources identified in response to Topic No. 2 and any recommendations given or limitations imposed by the State on the amount of Alleged Pollutants that each POTW or point source may discharge or release into the waters of the IRW.

Notice 10: Total Maximum Daily Loads ("TMDLs")

1. The status of the State's work on any TMDLs being developed, prepared, or

submitted for the IRW and any of the Alleged Pollutants including the date on which work commenced on the TMDL, the date of completion or submission (if applicable) and the reason for any delay in the completion or submission of the TMDL.

2. The involvement of or participation by the Oklahoma Attorney General's Office in any meetings, telephone conferences, or discussions relating to the any TMDL identified in response to Topic No. 1.

3. Any loading estimates, fate and transport modeling, or estimates of contribution among the various sources of Alleged Pollutants identified in connection with the consideration, development, or preparation of any TMDL identified in response to Topic No. 1.

4. Any recommendations or load allocations considered, proposed, or adopted as part of the development or preparation of any TMDL identified in response to Topic No. 1.

Notice 11: Animal Populations

1. The State's efforts to identify the number of livestock in the IRW or geographic or political subdivisions that include portions of the IRW.

2. The State's efforts to identify the number of wildlife in the IRW or geographic or political subdivisions that include portions of the IRW.

3. The State's knowledge about the efforts of others to identify numbers of livestock and wildlife, including the results of those efforts as known to the State.

4. The identity of the State personnel involved in tracking or quantifying numbers of livestock or wildlife within the State.

Notice 12: State Purchase or Use of Animal or Chemical Fertilizers

1. Apart from the poultry litter issues discussed in Notice 7, all information about the State's purchase of animal manure, including the amounts the State has expended to purchase animal manure.

2. Apart from the poultry litter issues discussed in Notice 7, all information about the State's use of animal manure within the IRW, including the date and amount of each application of animal manure, the total acreage covered by each application, and the purpose of each application.

3. All information about the State's purchase of chemical fertilizers, including the amounts the State has expended to purchase fertilizer.

4. All information about the State's use of chemical fertilizers within the IRW, including the date and amount of each application of fertilizer, the total acreage covered by each application, and the purpose of each application.